Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION

NO. 7: 20-CR-53-1BO(3)

IN RE:	)	
	)	
	)	MOTION TO SEAL
FOUR-COUNT	)	INDICTMENT
INDICTMENT PRESENTED ON	)	
APRIL 7, 2020 (L.M.D.)		

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby requests that the Indictment named on the previously attached Grand Jury Agenda be sealed so that the defendant therein named can be apprehended, and states as follows:

If the name of the defendant were to be made public prior to arrest, the chances of apprehending the defendant or apprehending the defendant without threat of violence or public commotion would be significantly reduced.

WHEREFORE, the United States of America respectfully prays for the sealing of the above-referenced Indictment, except that copies may be provided to the United States Attorney, Social Security Administration Office of the Inspector General, and the United States Probation Office.

It is further requested that the Indictment remain sealed until the defendant is apprehended, or until such time as the United States Attorney moves to unseal the Indictment, whichever event occurs first.

Respectfully submitted, this 7th day of April, 2020.

ROBERT J. HIGDON, JR. United States Attorney

TAMIKA MOSES

Special Assistant United States Attorney

Criminal Division